

FILED IN DISTRICT COURT  
McClain County, Oklahoma

IN THE DISTRICT COURT OF McCLAIN COUNTY  
STATE OF OKLAHOMA

AUG 20 2021

TIANA STANLEY,

Plaintiff,

v.

HENRY NENIEBARI WIFA; and  
HALLIBURTON ENERGY SERVICES,  
an Oklahoma Corporation,

Defendants.

+

}  
}  
}  
}  
}  
}  
}  
}  
}  
}

Kristel Gray, Court Clerk  
by RA, Deputy

Case No.: CJ-21-139

**PETITION**

Comes now Plaintiff, TIANA STANLEY, by and through her counsel of record, G. Thorne Stallings, Jr., and for her causes of action against said Defendants so alleges and states as follows:

**FIRST CAUSE OF ACTION**

1. On or about September 7, 2019, Defendant HENRY NENIEBARI WIFA (hereafter "WIFA") was negligent in the operation of a motor vehicle in McClain County, State of Oklahoma near Hwy 76 & 240<sup>th</sup> Street, Blanchard, Oklahoma, resulting in an automobile accident involving Plaintiff.
2. That Plaintiff is a resident of McClain County.
3. That Defendant HALLIBURTON ENERGY SERVICES ("HALLIBURTON") is an Oklahoma Corporation doing business in the State of Oklahoma.
4. This Court has jurisdiction to adjudicate the matters to be tried in this lawsuit and this Court is a proper venue because the collision occurred in McClain County, State of Oklahoma.

5. At all times material to this case, Defendant WIFA acted with reckless disregard to the safety of the Plaintiff.

6. That as a result of that accident, Plaintiff sustained severe personal injuries and other damages, entitling her to judgment for all categories of damages allowed under law exceeding the sum of Seventy-five Thousand Dollars (\$75,000.00).

7. That Defendant WIFA's negligent conduct was wanton, and in reckless disregard of Plaintiff's safety, thus entitling Plaintiff to exemplary damages as against him and HALLIBURTON in sums in excess of Seventy-five Thousand Dollars (\$75,000.00).

### **SECOND CAUSE OF ACTION**

Plaintiff, TIANA STANLEY, incorporates by reference all allegations contained in her First Cause of Action into her Second Cause of Action, for which she further states and alleges as follows:

8. That all times referenced herein, Defendant WIFA was in the employment and acting within the scope of his employment and/or authority of Defendant HALLIBURTON. HALLIBURTON, as a result, is vicariously liable for WIFA's neglect under the doctrine of Respondent Superior.

9. That Defendant HALLIBURTON negligently hired Defendant WIFA, and is therefore liable to Plaintiff for her damages.

10. That Defendant HALLIBURTON negligently entrusted Defendant WIFA with the truck it owned and he was driving at the time of the accident, and is therefore liable to Plaintiff for her damages.

11. That Defendant HALLIBURTON is thus liable for all of WIFA's negligent, wanton and reckless conduct thus entitling Plaintiff to judgment for actual damages for all

categories allowed under Oklahoma Law in Excess of Seventy-five Thousand Dollars (\$75,000.00), together with exemplary damages against said Defendants pursuant to law exceeding Seventy-five Thousand Dollars (\$75,000.00).

12. Pursuant to the provisions of 12 O.S. §3226(B)(2), Plaintiff submits this preliminary computation of damages sought in this lawsuit. As this is an action for injuries suffered by an adult, Plaintiff advises that all damages recoverable by law are sought, including those listed in OUJI 4.1. Plaintiff is unable to guess or speculate as to what amount of damages a judge and/or jury might award. The elements for the jury to consider in this case include the following:

- a. Plaintiff's physical pain and suffering, past and future;
- b. Plaintiff's mental pain and suffering, past and future;
- c. Plaintiff's age;
- d. Plaintiff's physical condition immediately before and after the accident;
- e. The nature and extent of Plaintiff's injuries;
- f. Whether the injuries are permanent;
- g. The physical impairment;
- h. The disfigurement;
- i. Loss of earnings/time;
- j. Impairment of earning capacity;
- k. The reasonable expenses of the necessary medical care, treatment, and services, past and future.

WHEREFORE, Plaintiff is entitled to damages against all Defendants, jointly and severally, as follows:

- a. Against Defendant HENRY NENIEBARI WIFA for all actual damages allowed

by Oklahoma Law in excess of Seventy-five Thousand Dollars (\$75,000.00) plus exemplary damages in excess of Seventy-five Thousand Dollars (\$75,000.00).

- b. Against Defendant HALLIBURTON ENERGY SERVICES for all actual damages allowed in excess of Seventy-five Thousand Dollars (\$75,000.00) plus exemplary damages in excess of Seventy-five Thousand Dollars (\$75,000.00).
- c. That Plaintiff's actual and exemplary damages against the Defendants exceed an amount that is in excess of the minimum amount of jurisdictional limits required for diversity jurisdiction pursuant to Section 1332 of Title 28 to the United States Code.
- d. Pre-judgment and post-judgment interest at the legal rate; and
- e. Such other and further relief as she may be justly entitled to receive.



G. THORNE STALLINGS, JR.

OBA #12000

STALLINGS LAW OFFICES

Blanchard Professional Building - Suite 3

1019 North Council

P.O. Box 1370

Blanchard, Oklahoma 73010

Telephone: (405) 485-3444

Facsimile: (405) 485-3137

E-mail: [T.stallings@stallingsatty.com](mailto:T.stallings@stallingsatty.com)

-and-

LYSBETH L. GEORGE, OBA #30562

LAW OFFICE OF LIZ GEORGE, PLLC

Blanchard Professional Building

1019 N. Council - Suite 3

P.O. Box 1375

Blanchard, Oklahoma 73010

Telephone: (405) 689-5502

Facsimile: (405) 689-5502

E-mail: [liz@georgelawok.com](mailto:liz@georgelawok.com)

**Attorneys for Plaintiff, TIANA STANLEY**

**ATTORNEY'S LIEN CLAIMED**